

### **REMARKS/ARGUMENTS**

The final Office Action of March 14, 2006 has been carefully reviewed and these amendments and remarks are responsive thereto. Claims 1, 6, 11 and 14 have been amended. No new matter has been added. Claims 1-18 remain pending after entry of this amendment. Reconsideration and allowance of the instant application are respectfully requested.

#### **Claim Rejections**

Claims 1-10 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Robotham *et al.* (U.S. Patent No. 6,704,024, hereinafter "Robotham"). This rejection is respectfully traversed for the following reasons.

Amended independent claims 1 and 6 recite, *inter alia*, "wherein the transparency map is later combined with foreground information to define one or more attributes of a likeness of the rendered ink and produce a resultant image that includes the likeness of said ink." Robotham does not disclose such a feature. In fact, the Office Action concedes at p. 5 that Robotham does not specifically mention the combining of foreground and background information. As such, claims 1 and 6 are allowable for at least this reason.

Additionally, claim 6 further recites, *inter alia*, "means for creating a transparency map, wherein the transparency map stores *only* transparency information, wherein at least a portion of the transparency information corresponds to said ink." (Emphasis added). Robotham does not disclose such a feature. Robotham merely discloses a bitmap including per-pixel transparency data. Robotham does not disclose that the bitmaps are limited to only transparency data. Claim 6 is thus allowable for this additional reason.

Claims 2-5 and 7-10 are dependent on their respective base claims and are thus allowable for at least the same reasons as their respective base claims and further in view of the novel and non-obvious features recited therein.

Claims 11-18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Robotham in view of Aleksic *et al.* (U.S. Patent No. 6,927,778, hereinafter "Aleksic"). This rejection is respectfully traversed for the following reasons.

Amended independent claims 11 and 14 relate to, *inter alia*, creating a transparency map storing transparency information related to ink input received from a user and combining the

transparency map with foreground information to define one or more attributes of a likeness of the ink and to produce a resultant image. Nowhere does either Robotham or Aleksic, either separately or in combination, teach or suggest such a feature. As previously discussed, the Office Action concedes at p. 5 that Robotham does not specifically mention the combining of foreground and background information. However, the Office Action asserts that Aleksic teaches such a feature. Contrary to the Office Action's assertion, the cited passage in Aleksic merely describes combining pixel data of a foreground object to the pixels of a background object to simulate particular image effects. Col. 2, ll. 52-57. Aleksic further teaches supplying alpha values to define a proportion of the foreground object to use in an output pixel. However, claims 11 and 14 relate to applying foreground information *to a transparency map* to define one or more attributes of *a likeness of the ink*. Defining a proportion of a foreground object to use in generating an output pixel and using foreground information to define or more attributes of an ink likeness are wholly dissimilar processes. That is, there is no teaching or suggestion the proportion of the foreground object used in generating an output pixel relates to an attribute of an ink likeness. Claims 11 and 14 are thus allowable for at least this reason.

Claims 12-13 and 15-18 are dependent on their respective base claims, and are thus allowable for at least the same reasons as their respective base claims and further in view of the novel and non-obvious features recited therein.


All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

Respectfully submitted,  
**BANNER & WITCOFF, LTD.**

Dated: May 15, 2006

By: \_\_\_\_\_

  
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